



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 24, 2014

LAWRENCE DUNCAN, III, TREASURER
LOCKHEED MARTIN CORPORATION EMPLOYEES'
POLITICAL ACTION COMMITTEE
2121 CRYSTAL DRIVE SUITE 100
ARLINGTON, VA 22202

Response Due Date
12/29/2014

IDENTIFICATION NUMBER: C00303024

REFERENCE: AUGUST MONTHLY REPORT (07/01/2014 - 07/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the

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recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2014 Primary election; however, the funds were redesignated after the election date(s) (see attached). Please note that contributions may not be redesignated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Further, a written request for a redesignation of a contribution must be provided to the treasurer within 60 days of the treasurer's receipt. 11 CFR §110.2(b)

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question was redesignated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

Also, if the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. 11 CFR §110.2(b)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding this impermissible activity, your prompt action will be taken into consideration.

3. The Commission notes the redesignation and/or reattribution of several

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contributions. Please amend your report to disclose the proper format for redesignations and/or reattributions. The first entry must disclose, as a memo entry, the information for the contribution as it was originally reported; the second entry must disclose, as a memo entry, the information as it has been redesignated or reattributed, including the date the redesignation or reattribution documentation was made/received by the committee (11 CFR §104.8(d)(2), (3), and (4)) The Committee should also provide the Commission with a copy of the signed documentation. See the attached sample of properly reported redesignation.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

Sincerely,



Kaitlin Seufert
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
Lockheed Martin Corporation Employees' Political Action Committee (C00303024)

Excessive Contributions to a Committee/Candidate Committee

| Recipient Name | Date | Amount | Election | Report |
|-----------------------|-------------|---------------|-----------------|------------------------|
| Hanabusa For Hawaii | 3/26/13 | \$1,000.00 | P2014 | 2013 April Monthly |
| Hanabusa For Hawaii | 7/18/13 | \$2,500.00 | P2014 | 2013 August Monthly |
| Hanabusa For Hawaii | 8/22/13 | \$1,500.00 | P2014 | 2013 September Monthly |
| Hanabusa For Hawaii | 7/28/14 | \$1,000.00 | P2014 | 2014 August Monthly |

Redesignations Made After Election Date

| Recipient Name | Date | Amount | Election | Election (State/Date) |
|------------------------|-------------|---------------|-----------------|----------------------------------|
| Cory Booker For Senate | 7/29/14 | \$5,000.00 | P2014 | NJ-6/3/14 |
| Cory Booker For Senate | 7/29/14 | \$5,000.00 | G2013 | NJ-10/16/13 |

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